

COHEN & GREEN

August 18, 2023

Hon. Ona T. Wang
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

By Electronic Filing.

Re: Case No. 22-cv-01445, Rodney v City of New York, et al.

Dear Judge Wang:

My firm, with co-counsel, represents Plaintiff in the case named above. Particularly in light of the Court's most recent order at ECF No. 110 ("Please do not send another copy of the video"), I write to ask how the Court would prefer to receive the courtesy copies of Plaintiff's opposition to the renewed motion to dismiss (e.g., ECF Nos. 112 and 113) called for in the Court's Civil Case Individual Practices in § VII.

As the Court likely recalls, on the prior motion, there were voluminous exhibits — a large share of which was the transcript of the legislative hearing on the City Right to Record Act (*see, e.g.*, ECF Nos. 113-5 and 47-5), which had relevant comments littered throughout the record. The Court's Practice VII applies to the filing here because it is more than 75 pages. However, the Court already has the first 10 of the 13 Exhibits to the new Green Declaration.¹ Therefore, Plaintiff would appreciate clarification on whether the Court would prefer:

1. A full new set of courtesy copies of the papers, with all exhibits;
2. A supplement, only consisting of the documents that have changes, which would be:
 - a. The new memo of law (ECF No. 112);
 - b. The new declaration (ECF No. 113); and
 - c. The three new exhibits (ECF Nos. 113-11, 113-12, and 113-13); or
3. Something else (perhaps no courtesy copies at all).

I mention the third because at the initial conference, the Court seemed to suggest it was surprised to be receiving courtesy copies at all.

¹ That is, ECF No. 113-1 is the same as ECF No. 47-1; 113-2 is the same as 47-2, and so on.



As always, I thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

COHEN&GREEN P.L.L.C.

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cc:

All relevant parties by electronic filing.